

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

CORY HAMMOCK,

Plaintiff,

v.

MOVING STATE TO STATE LLC, STATE TO STATE MOVING NY INC, STATE TO STATE MOVING GROUP LLC, DIRECT VAN LINES SERVICES INC., AROUND THE CLOCK MOVING SERVICES INC., YARIN NADEL a.k.a. JOE MILLER a.k.a. JOE NADEL, MICHAEL NADEL a.k.a. MICKEY MILLER,

Defendants

1:18-CV-05628-SJ-ST

**DECLARATION IN SUPPORT OF
REQUEST FOR CERTIFICATE OF
DEFAULT**

Tanner Bryce Jones, an attorney duly admitted to practice law in the courts of the State of New York, affirms the following to be true under the penalties of perjury:

1. I am a shareholder at Anderson Kill P.C., attorneys for Plaintiff Cory Hammock in the above-captioned action and, as such, I am familiar with the facts set forth below.
2. The Third Amended Complaint was filed with this Court on January 16, 2020.
3. Pursuant to order of Magistrate Judge Steven Tiscione (see Docket entry No. 41), entered into the Docket on May 11, 2020, service of the Third Amended Complaint on the individual defendants Yarin Nadel and Michael Nadel has been effectuated by sending a copy of the complaint to defendants' criminal defense attorney, Dmitriy Shakhnevich, both by regular mail to his office and by email to his official email account used to receive ECF notifications from the Court. Plaintiff served the Third Amended Complaint in this manner on June 12, 2020.
4. The time for above-referenced Defendants to answer or otherwise move with respect to the complaint herein has expired.

5. Above-referenced Defendants have not answered or otherwise moved with respect to the complaint, and their time to answer or otherwise move has not been extended.

6. Upon information and belief, Defendants Yarin Nadel, and Michael Nadel are not infants or incompetent, nor are they presently in the military service of the United States as appears from facts in this litigation.

WHEREFORE, Plaintiff Cory Hammock requests that the default of Defendants Yarin Nadel and Michael Nadel, be noted and a certificate of default issued.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to plaintiff, and that no part thereof has been paid.

Dated: July 24, 2020

/s/ Bryce Jones

T. Bryce Jones, Esq.
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